



Surveillance Technology Policy

Unmanned aerial vehicles ("UAV" or "Drone" technology)

Public Works

The City and County of San Francisco values privacy and protection of San Francisco residents' civil rights and civil liberties. As required by San Francisco Administrative Code, Section 19B, the Surveillance Technology Policy aims to ensure the responsible use of Unmanned aerial vehicles ("UAV" or "Drone" technology) itself as well as any associated data, and the protection of City and County of San Francisco residents' civil rights and liberties.

PURPOSE AND SCOPE

The Department's mission is to: enhance the quality of life in San Francisco as responsible stewards of the public's physical assets by providing outstanding service in partnership with the community. We design, build, manage, maintain, green, protect and improve the City's public spaces (infrastructure, public right of way and facilities) with skill, pride, innovation, and responsiveness.

The Surveillance Technology Policy ("Policy") defines the manner in which the Unmanned aerial vehicles or Drone technology will be used to support this mission, by describing the intended purpose, authorized and restricted uses, and requirements.

This Policy applies to all department personnel that use, plan to use, or plan to secure Unmanned aerial vehicles or Drone technology, including employees, suppliers, contractors, and volunteers while working on behalf of the City with the Department.

POLICY STATEMENT

Unmanned Aerial Vehicles and Drone technology for the Department is limited to the following use cases and is subject to the requirements listed in this Policy.

Authorized Use(s):

1. Disaster preparedness and response
2. Environmental monitoring and documentation
3. Inspect/Survey properties & assets
4. Project inspection and documentation
5. Surveying/Mapping data collection

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying an individual person, data concerning health or data concerning an individual person's sex life or sexual orientation shall be prohibited.

BUSINESS JUSTIFICATION

Unmanned aerial vehicles and Drone technology supports the Department’s mission and provides important operational value in the following ways:

1. In times of disaster preparedness or post-disaster mitigation, drones will provide critical emergency response functions such as logistical support for emergency routing, life safety, and cleanup efforts, not only assisting in protecting physical assets and public spaces but human life as well;
2. Drones will support the maintenance efforts of City-owned streets and trees pursuant to our mission of greening and improving City public spaces;
3. Drones will support the objective of maintaining city owned properties and landscapes by safely providing detailed photographic data and documentation to assist in the planning of corrective or new construction work by roofers, architects, engineers, electricians, PMs, CMs and other personnel.

In addition, Unmanned aerial vehicles and Drone technology promises to benefit residents in the following ways:

- | | | |
|-------------------------------------|-----------------------|--|
| <input checked="" type="checkbox"/> | Education | Drone imagery to promote Public Works projects and demonstrate use of tax dollars on projects. |
| <input type="checkbox"/> | Community Development | |
| <input type="checkbox"/> | Health | |
| <input checked="" type="checkbox"/> | Environment | Drone imagery to collect data on street-trees for maintenance and safety reasons. |
| <input type="checkbox"/> | Criminal Justice | |
| <input type="checkbox"/> | Jobs | |
| <input type="checkbox"/> | Housing | |
| <input checked="" type="checkbox"/> | Other | Public Safety: to inspect tree canopies for damaged limbs (fall risks), to provide support when determining safety routes during emergencies, to collect data and information during emergencies (particularly in the event of loss of cellular communications) and during post-disaster cleanup operations. |

Unmanned aerial vehicles and Drone technology will benefit the department in the following ways:

Benefit	Description	Quantity
<input checked="" type="checkbox"/>	Financial Savings	
	Drones can be far more time efficient and cost effective when conducting asset inspections, by mitigating the need for traffic control, expensive scaffolding/swing stage or other equipment, and can provide more detailed photographs/videos of the assets or areas in need of maintenance or repairs than can be done manually, minimizing labor costs.	
<input checked="" type="checkbox"/>	Time Savings	
	Deploying a drone can provide time savings over setting up and employing equipment such as scaffolds/swing stages/scissor-lift vehicles, etc.	

Staff Safety

Drones can be deployed to dangerous locations instead of personnel, such as rooftops, at the sides of building/bridges, along cliff areas or areas prone to erosion.

Data Quality

Some locations which are difficult to access by personnel may be more easily photographed using drone technology, thereby achieving better data.

Other

POLICY REQUIREMENTS

This Policy defines the responsible data management processes and legally enforceable safeguards required by the Department to ensure transparency, oversight, and accountability measures. .

Specifications:	The software and/or firmware used to operate the surveillance technology must be kept up to date and maintained.			
Safety:	Surveillance technology must be operated in a safe manner. Surveillance technology should not be operated in a way that infringes on resident civil rights, including privacy, or causes personal injury or property damage.			
Data Collection:	<p>Information collected, retained, processed or shared by surveillance technology must be consistent with this Policy; must comply with all City, State, and Federal laws and regulations; and must protect all state and federal Constitutional guarantees.</p> <p>Departments shall minimize the use, collection, and retention of Personally Identifiable Information (PII) to what is strictly necessary to accomplish the intended purpose of the surveillance technology.</p> <p>Department shall only collect data required to execute the authorized use case. All data collected by the surveillance technology, including PII, shall be classified according to the City's Data Classification Standard.</p> <p>Should information be incidentally collected that is not necessary to accomplish the intended purpose of the surveillance technology, including information that may be used to identify persons or private information, Department shall remove all incidental PII from raw data.</p> <p>Data types can take the form video, audio, still images. Data formats can take the form of XML, PDF, HTML, Plain Text, JPEG, etc. The surveillance technology collects the following data types and formats:</p> <ul style="list-style-type: none">• Video in MOV format• Still images from cameras in PDF format <p>The surveillance technology collects the following data types:</p> <table border="1"><thead><tr><th><i>Data Type(s)</i></th><th><i>Format(s)</i></th><th><i>Classification</i></th></tr></thead></table>	<i>Data Type(s)</i>	<i>Format(s)</i>	<i>Classification</i>
<i>Data Type(s)</i>	<i>Format(s)</i>	<i>Classification</i>		

	<p>Images/video of CCSF projects, assets, trees, etc. JPGE, MOV, AVI Level 1</p> <hr/> <p>Images/video of CCSF projects, assets, trees, etc. JPGE, MOV, AVI Level 2</p> <hr/>
Notification:	<p>Departments shall notify the public of intended surveillance technology operation at the site of operations through signage in readily viewable public areas. Department notifications shall identify the type of technology being used and the purpose for such collection.</p> <p>Department includes the following items in its public notice:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Information on the surveillance technology <input checked="" type="checkbox"/> Description of the authorized use <input checked="" type="checkbox"/> Type of data collected <input checked="" type="checkbox"/> Will persons be individually identified <input checked="" type="checkbox"/> Data retention <input checked="" type="checkbox"/> Department identification <input checked="" type="checkbox"/> Contact information
Access:	<p>All parties requesting access must adhere to the following rules and processes (please refer to the data sharing section to ensure all information covered in that section is also included below): Distinctive personal features or license plate information collected inadvertently (if any) will be blurred using an approved editing software prior to use or storage of images (drone “data”) for any business purposes. Once PII have been obscured or removed from images, data may be used by department based on use cases identified above and may be stored on servers for future use. RAW (unedited) data shall not be used or retained.</p> <p>Data must always be scrubbed of PII as stated above prior to use.</p> <p style="padding-left: 40px;">A. <i>Department employees and contractors</i></p> <p>Employees: Once collected, the following roles and job titles are authorized to access and use data collected, retained, processed, or shared by the surveillance technology.</p> <ol style="list-style-type: none"> 1. 7333-35 Stationary Engineer 2. 5310-13 Surveyor class series 3. 5201-18 Engineers class series 4. 1823-27 Analyst class series 5. 0922-0954 Manager class series 6. 3435 BUF Inspectors 7. 5120 Architectural Administrator 8. 5260-74 Architect Class Series

	<p>9. San Francisco Public Works: Bureau of Street Use & Mapping, Bureau of Urban Forestry, Bureau of Building Repair, Bureau of Engineering, Bureau of Architecture, Streets and Environmental Services, Streets and Sewer Repair</p> <p><u>Contractors</u>: The following providers are required to support and maintain the surveillance technology and its associated data to ensure it remains functional:</p> <ul style="list-style-type: none"> • At this point, Public Works does not anticipate using specific contractors whose services may be required • However, if Public Works does use contractors, they will follow Public Works' Surveillance Technology Policy <p><i>B. Members of the public</i></p> <p>Public Works will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.</p> <p>Collected data that is classified as Level 1-Public data may be made available for public access or release via DataSF's Open Data portal. Anyone, including criminal defendants, may access such data. Open Data has a Public Domain Dedication and License, and makes no warranties on the information provided. Once public on Open Data, data can be freely shared, modified, and used for any purpose without any restrictions. Any damages resulting from use of public data are disclaimed, including by criminal defendants.</p> <p>Members of the public, including criminal defendants, may also request access by submission of a request pursuant to San Francisco's Sunshine Ordinance. No record shall be withheld from disclosure in its entirety unless all information contained in it is exempt from disclosure under express provisions of the California Public Records Act or some other statute.</p>
Data Security:	<p>Department shall secure PII against unauthorized or unlawful processing or disclosure; unwarranted access, manipulation or misuse; and accidental loss, destruction, or damage. Surveillance technology data collected and retained by the Department shall be protected by the safeguards appropriate for its classification level(s).</p> <p>To protect surveillance technology information from unauthorized access and control, including misuse, Departments shall, at minimum, apply the following safeguards:</p> <p>Only authorized drone operators or PM may access unedited data.</p>
Data Sharing:	<p>Public Works will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.</p> <p>Public Works will endeavor to ensure that other agencies or departments that may receive data collected by Department of Public Work's unmanned aerial vehicles policy will act in conformity with this Surveillance Technology Policy.</p>

For internal and externally shared data, shared data shall not be accessed, used, or processed by the recipient in a manner incompatible with the authorized use cases stated in this Policy.

Public Works shall ensure proper administrative, technical, and physical safeguards are in place before sharing data with other CCSF departments, outside government entities, and third-party providers or vendors. (See Data Security)

Public Works shall ensure all PII and restricted data is de-identified or adequately protected to ensure the identities of individual subjects are effectively safeguarded.

Each department that believes another agency or department receives or may receive data collected from its use of STs should consult with its assigned deputy city attorney regarding their response.

The Department currently participates in the following sharing practices:

A. Internal Data Sharing

Department shares the following data with the recipients: The department does not share surveillance technology data containing non-obscured (“raw” or unedited) PII with other departments or entities inside the City and County of San Francisco.

Data sharing occurs at the following frequency: N/A

Before sharing data with any recipients, the Department will use the following procedure to ensure appropriate data protections are in place:

- Confirm the purpose of the data sharing aligns with the department’s mission.
- Consider alternative methods other than sharing data that can accomplish the same purpose.
- Redact names, scrub faces, and ensure all PII is removed in accordance with the department’s data policies.
- Review of all existing safeguards to ensure shared data does not increase the risk of potential civil rights and liberties impacts on residents.
- Evaluation of what data can be permissibly shared with members of the public should a request be made in accordance with the San Francisco’s Sunshine Ordinance.
- Ensure shared data will be done in a cost-efficient manner and exported in a clean, machine-readable format.

B. External Data Sharing

Department shares the following data with the recipients:

	<ul style="list-style-type: none"> In emergency scenarios, Public Works may provide data to departments such as SFMTA, SFPUC, SF Port, SF Airport, SFDBI, and public access based on the Sunshine Ordinance. This data will be scrubbed and all PII will be removed, per Public Works’ data processing protocols. <p>Data sharing occurs at the following frequency: Data sharing will vary by case.</p> <p>To ensure that entities receiving data collected by the surveillance technology comply with the Surveillance Technology Policy, Department shall:</p> <ul style="list-style-type: none"> Public Works will process raw data collected by drones as expeditiously as possible, removing or obscuring all PII. Only post-processed (i.e., “scrubbed”) data will be maintained by Public Works per federal (FEMA) and state (OES) and local reimbursement and investigation requirements. Unedited data shall be deleted upon completion of processing. 		
<p>Data Retention:</p>	<p>Department may store and retain raw PII data only as long as necessary to accomplish a lawful and authorized purpose.</p> <p>Data retention schedules (i.e., x type of data will be retained for 1 year) based on the following categories:</p> <ol style="list-style-type: none"> Permanent records (i.e., records that are essential): shall be retained and preserved indefinitely Current records (i.e., records for operational necessity, ready reference, convenience): record retention schedules may vary but generally less than 10 years Storage records (i.e., records retained offsite): record retentions may vary but generally less than 10 years <p>The Department’s data retention period and justification are as follows:</p> <table border="1" data-bbox="487 1312 1372 1816"> <tr> <td data-bbox="487 1312 906 1816"> <p>Public Works will process raw data collected by drones as expeditiously as possible, and will commit to remove or obscure all PII within one year of collection. Only post-processed (i.e., “scrubbed”) data will be maintained by Public Works per federal (FEMA) and state (OES) and local reimbursement and investigation requirements. Unedited data shall be deleted upon completion of processing.</p> </td> <td data-bbox="906 1312 1372 1816"> <p>Scrubbed data will be maintained in Public Works servers for historical purposes.</p> </td> </tr> </table>	<p>Public Works will process raw data collected by drones as expeditiously as possible, and will commit to remove or obscure all PII within one year of collection. Only post-processed (i.e., “scrubbed”) data will be maintained by Public Works per federal (FEMA) and state (OES) and local reimbursement and investigation requirements. Unedited data shall be deleted upon completion of processing.</p>	<p>Scrubbed data will be maintained in Public Works servers for historical purposes.</p>
<p>Public Works will process raw data collected by drones as expeditiously as possible, and will commit to remove or obscure all PII within one year of collection. Only post-processed (i.e., “scrubbed”) data will be maintained by Public Works per federal (FEMA) and state (OES) and local reimbursement and investigation requirements. Unedited data shall be deleted upon completion of processing.</p>	<p>Scrubbed data will be maintained in Public Works servers for historical purposes.</p>		

	<p>PII data shall not be kept in a form which permits identification of data subjects for any longer than is necessary for the purposes for which the personal data are processed. PII data collected by the surveillance technology may be retained beyond the standard retention period only in the following circumstance(s): N/A</p> <p>Departments must establish appropriate safeguards for PII data stored for longer periods.</p> <p>Data will be stored in the following location:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Local storage <input type="checkbox"/> Department of Technology Data Center <input type="checkbox"/> Software as a Service Product <input checked="" type="checkbox"/> Cloud Storage Provider
Data Disposal:	<p>Upon completion of the data retention period, Department shall dispose of data in the following manner:</p> <p>Practices:</p> <ol style="list-style-type: none"> 1. Raw (unprocessed) data will be collected by the drone in the field, and stored on an onboard storage disc (i.e, "SD" card). 2. Raw data (from the drone disc) will be downloaded from onboard storage disc onto secure Public Works servers by Drone Data Editor. 3. Still or video frames will be identified for use by the appropriate Public Works data consumer (based upon pre-approved Public Works use cases.) <p>Such data may include, as examples, images of buildings and structures, overhead images of topographic features, images of City tree canopy/limbs, and/or video images featuring Public Works project locations for use in Public Works TV episodes or other promotional materials.</p> <p>Once the subject image frames, still and/or video, have been identified for business needs, the Public Works Data editor will review all selected frames and identify each instance of PII (faces or license plates). All instances of PII will be blurred or obscured using editing software, such that no recognizable human features or license plate information remain.</p> <p>After processing and saving of edited data, all raw data will be permanently erased. Before replacing the SD storage cards into the drone, data editor will ensure the discs are completely free of all data.</p> <p>Processes and Applications: All instances of PII will be blurred or obscured using editing software, such that no recognizable human features or distinctly identifying information remain.</p>
Training:	<p>To reduce the possibility that surveillance technology or its associated data will be misused or used contrary to its authorized use, all individuals requiring access to unedited data with PII present must receive training on data security policies and procedures.</p>

At the very least, department shall require all elected officials, employees, consultants, volunteers, and vendors working with the technology on its behalf to read and formally acknowledge all authorized and prohibited uses. Department shall also require that all individuals requesting data or regularly requiring data access receive appropriate training before being granted access to systems containing PII.

Data editors will be trained to properly utilize the editing software to ensure that all PII has been removed from still or video drone images before those images are released to other agencies or the public, or stored on servers for long term retention.

COMPLIANCE

Department shall oversee and enforce compliance with this Policy using the following methods:

1. Two individuals will be assigned to maintain updates and perform required maintenance. A procedural pre-mobilization and post-mobilization safety check will be performed at each operation.
2. Department shall assign one or more of the following personnel to oversee Policy compliance by the Department and third-parties.
 - a. Senior Administrative Analyst,
 - b. BSM Deputy Bureau Manger,
 - c. BOE Deputy Bureau Manager,
 - d. BOE structural section manager,
 - e. BOA Deputy Bureau Manager,
 - f. BUF Deputy Bureau Manager,
 - g. Architectural Administrator,
 - h. Architects and Engineers

Sanctions for violations of this Policy include the following:

1. First offense: violator shall be verbally notified by Public Works management of nature of violation.
2. Second offense: violator shall be notified in writing of second offence and privileges to operate drone hardware shall be suspended for 60 days.
3. Third offense: (following reinstatement of operator privileges): violator shall be permanently banned from drone operations and disciplinary action may be taken depending upon the severity of second/third offences.

If a Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.

Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.

EXCEPTIONS

Only in exigent circumstances or in circumstances where law enforcement requires surveillance technology data for investigatory or prosecutorial functions may data collected, retained, or processed by the surveillance technology be shared with law enforcement.

DEFINITIONS

Personally Identifiable Information:	Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.
Raw Data:	Information collected by a surveillance technology that has <u>not</u> been processed and cleaned of all personal identifiable information. The distribution and use of raw data are tightly restricted.
Exigent Circumstances	An emergency involving imminent danger of death or serious physical injury to any person that requires the immediate use of Surveillance Technology or the information it provides.

AUTHORIZATION

Section 19B.4 of the City's Administrative Code states, "It is the policy of the Board of Supervisors that it will approve a Surveillance Technology Policy ordinance only if it determines that the benefits the Surveillance Technology ordinance authorizes outweigh its costs, that the Surveillance Technology Policy ordinance will safeguard civil liberties and civil rights, and that the uses and deployments of the Surveillance Technology under the ordinance will not be based upon discriminatory or viewpoint-based factors or have a disparate impact on any community or Protected Class."

QUESTIONS & CONCERNS

Public:

Complaints or concerns can be submitted to the Department by

Members of the public can register complaints / concerns or submit questions at San Francisco Public Works Bureau of Street-Use and Mapping (BSM) 1155 Market Street, 3rd Floor San Francisco, CA 94103, 415-554-5810 or via calls/emails to 311.org. As of July 15, Public Works will be located at 49 South Van Ness, suite 300, 94102.

Department shall acknowledge and respond to complaints and concerns in a timely and organized response. To do so, Department shall:

Constituent calls and complaints to the Bureau of Street-Use and Mapping (BSM) are received by counter personnel and routed to the bureau's Drone Program manager. Program manager will discuss concerns or complaints with constituent, enter details regarding nature of conversation on excel spreadsheet stored in Public Works shared drive, referred to as the drone Constituent Feedback Log ("CFL"). If additional action is required or requested by caller, Public Works commits to a follow-up (by email or telephone) within 48 hours. Department shall be prepared to host a viewing of edited imagery if caller is insistent, to demonstrate that no PII was collected. Depending upon the urgency or sensitivity of call, Drone Program manager shall notify bureau of details and discuss resolution before follow-up with caller. The final outcome and action(s) taken shall be logged onto CFL.

Public Works drone operators and Public Works management shall review log on a quarterly basis to discuss best practices, evaluate for learning lessons and opportunities to improve and refine the drone use program based on caller complaints, concerns and other community feedback.

City and County of San Francisco Employees:

All questions regarding this policy should be directed to the employee's supervisor or to the director. Similarly, questions about other applicable laws governing the use of the surveillance technology or the issues related to privacy should be directed to the employee's supervisor or the director.

APPENDIX A: Surveillance Technology Policy Requirements

The following section shows all Surveillance Technology Policy requirements in order as defined by the San Francisco Administrative Code, Section 19B. It is a concise summary of what is covered in a narrative version above.

1. A description of the product and services addressed by the Surveillance Technology, including the identity of any provider(s) whose services are essential to the functioning or effectiveness of the Surveillance Technology equipment or services for the intended purpose.

Use of drone technology to intentionally capture images of a personal nature will always be prohibited. Phantom 4 RTK is an aerial survey drone that combines centimeter-level navigation and positioning with a high-performance imaging system for use during surveying, mapping or inspection operations.

Intel Falcon 8+ is designed to provide consistent, stable flights with weak GPS signals, high winds as well as resistance to magnetic field. Falcon 8+ drone can provide detailed data for orthography and 3D reconstruction, with millimeter accuracy for ground sample distance. Unique, patented "V-shaped design enables a greater than 180-degree view from top to bottom. Falcon 8+ system can be configured as a closed system with isolated, on-board data storage that does not transmit data over the public internet.

The Leica Aibot AX20 is built on a DJI unmanned aerial vehicle platform which can accommodate various sensor payloads for surveying, mapping, and construction aerial data capture solutions.

DJI Mavic 2 Enterprise Dual is an aerial survey drone that combines navigation and positioning with a high-performance imaging system for use during surveying, mapping or inspection operations.

2. A description of the purpose(s) for which the Surveillance Technology equipment or services are proposed for acquisition, including the type of data that may be collected by the Surveillance Technology equipment or services.

Technology Use:

Drone technology will support our mission through the following:

- 1. In times of disaster preparedness or post-disaster mitigation, drones will provide critical emergency response functions such as logistical support for emergency routing, life safety, and cleanup efforts, not only assisting in protecting physical assets and public spaces but human life as well;*
- 2. Drones will support the maintenance efforts of City-owned street trees pursuant to our mission of greening and improving City public spaces;*
- 3. Drones will support the objective of maintaining city owned properties and landscapes by safely providing detailed photographic data and documentation to assist in the planning of corrective or new construction work by roofers, architects, engineers, electricians, PMs, CMs and other personnel.*

PII:

true

3. The uses that are authorized, the rules and processes required prior to such use, and uses of the Surveillance Technology that will be expressly prohibited.

Authorized Uses:

Disaster preparedness and response

Environmental monitoring and documentation

Inspect/Survey properties & assets

Project inspection and documentation

Surveying/Mapping data collection

Rules:

Prohibited Uses:

Data must always be scrubbed of PII as stated above prior to use.

4. A description of the formats in which information collected by the Surveillance Technology is stored, copied, and/or accessed.

Data Type	Formats STP
Images/video of CCSF projects, assets, trees, etc.	JPGE, MOV, AVI
Images/video of CCSF projects, assets, trees, etc.	JPGE, MOV, AVI

5. The specific categories and titles of individuals who are authorized by the Department to access or use the collected information, including restrictions on how and under what circumstances data collected with Surveillance Technology can be analyzed and reviewed, and the rules and processes required prior to access or use of the information.

Employee Job Classification & Title:

Titles listed in 'Access' section above. Data must always be scrubbed of PII as stated above prior to use.

Department:

1. San Francisco Public Works:
 - a. Bureau of Street Use & Mapping
 - b. Bureau of Urban Forestry
 - c. Bureau of Building Repair
 - d. Bureau of Engineering
 - e. Bureau of Architecture
 - f. Streets and Environmental Services
 - g. Streets and Sewer Repair

If applicable, contractor or vendor name:

N/A

Rules and processes required prior to data access or use:

Only authorized drone operators or PM may access unedited data.

6. The general safeguards that protect information from unauthorized access, including encryption and access control mechanisms.

Data must always be scrubbed of PII as stated above prior to use. Access will only be granted to titles listed above in 'Access' section.

7. The limited time period, if any, that information collected by the Surveillance Technology will be routinely retained, the reason such retention period is appropriate to further the purpose(s) enumerated in the Surveillance Technology Policy, the process by which the information is regularly deleted after that period lapses, and the specific conditions that must be met to retain information beyond that period

Retention:

Scrubbed data will be maintained in Public Works servers for historical purposes.

Reason for retention:

N/A

Deletion process:

Scrubbed data will be maintained in Public Works servers for historical purposes.

Retention exemption conditions:

All instances of PII will be blurred or obscured using editing software, such that no recognizable human features or distinctly identifying information remain.

8. How collected information can be accessed or used by members of the public, including criminal defendants

Will the data be accessible to the public:

Public Works will process raw data collected by drones as expeditiously as possible, removing or obscuring all PII. Only post-processed (i.e., "scrubbed") data will be maintained by Public Works per federal (FEMA) and state (OES) and local reimbursement and investigation requirements. Unedited data shall be deleted upon completion of processing.

How it can be accessed: access is described in the 'Access' section above

9. Which governmental agencies, departments, bureaus, divisions, or units that may receive data collected by the Surveillance Technology operated by the Department, including any required justification or legal standard necessary to share that data and how it will ensure that any entity receiving such data complies with the Surveillance Technology Policy.

Name of agency: In emergency scenarios, Public Works may share unedited data with CCSF departments such as SFMTA, SFPUC, SF Port, SF Airport, SFDDBI, and public access based on the Sunshine Ordinance

10. The training required for any individual authorized to use the Surveillance Technology or to access information collected by the Surveillance Technology

Training required:

True

Description of training:

Data editors will be trained to properly utilize the editing software to ensure that all PII has been removed from still or video drone images before those images are released to other agencies or the public, or stored on servers for long term retention.

11. The mechanisms to ensure that the Surveillance Technology Policy is followed, including internal personnel assigned to ensure compliance with the policy, internal recordkeeping of the use of the technology or access to information collected by the technology, technical measures to monitor for misuse, any independent person or entity with oversight authority, and the sanctions for violations of the policy

Training required:

True

Process for responding to complaints:

Senior Administrative Analyst, BSM Deputy Bureau Manger, BOE Deputy Bureau Manager, BOE structural section manager, BOA Deputy Bureau Manager, BUF Deputy Bureau Manager, Architectural Administrator, Architects and Engineers

Oversight process:

1. First offense: violator shall be verbally notified by Public Works management of nature of violation.
2. Second offense: violator shall notified in writing of second offence and privileges to operate drone hardware shall be suspended for 60 days.
3. Third offense: (following reinstatement of operator privileges): violator shall be permanently banned from drone operations and disciplinary action may be taken depending upon the severity of second/third offences.

Compliance personnel titles:

1. 7333-35 Stationary Engineer
2. 5310-13 Surveyor class series
3. 5201-18 Engineers class series
4. 1823-27 Analyst class series
5. 0922-0954 Manager class series
6. 3435 BUF Inspectors
7. 5120 Architectural Administrator
8. 5260-74 Architect Class Series

San Francisco Public Works:

Bureau of Street Use & Mapping

Bureau of Urban Forestry

Bureau of Building Repair

Bureau of Engineering

Bureau of Architecture

Streets and Environmental Services

Streets and Sewer Repair

Restrictions:

Data must always be scrubbed of PII as stated above prior to use.

12. What procedures will be put in place by which members of the public can register complaints or concerns, or submit questions about the deployment or use of a specific Surveillance Technology, and how the Department will ensure each question and complaint is responded to in a timely manner.

Complaint procedures:

Constituent calls and complaints to the Bureau of Street-Use and Mapping (BSM) are received by counter personnel and routed to the bureau's Drone Program manager. Program manager will discuss concerns or complaints with constituent, enter details regarding nature of conversation on excel spreadsheet stored in Public Works shared drive, referred to as the drone Constituent Feedback Log ("CFL"). If additional action is required or requested by caller, Public Works commits

to a follow-up (by email or telephone) within 48 hours. Department shall be prepared to host a viewing of edited imagery if caller is insistent, to demonstrate that no PII was collected. Depending upon the urgency or sensitivity of call, Drone Program manager shall notify bureau of details and discuss resolution before follow-up with caller. Final outcome and action(s) taken shall be logged onto CFL.

Public Works drone operators and Public Works management shall review log on a quarterly basis to discuss best practices, evaluate for learning lessons and opportunities to improve and refine the drone use program based on caller complaints, concerns and other community feedback.

Departmental follow-up process:

Two individuals will be assigned to maintain updates and perform required maintenance. A procedural pre-mobilization and post-mobilization safety check will be performed at each operation.

Members of the public can register complaints/concerns or submit questions via calls or emails at 311.org.